

EXHIBIT 1

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

AD HOC COMMITTEE OF NON-US
CUSTOMERS OF FTX.COM,

Plaintiffs,

v.

FTX TRADING, LTD., *et al.*

Defendants.

Adv. Pro. No. 22-50514 (JTD)

Ref. Nos. 1, 4, 8 & __

**ORDER APPROVING SECOND STIPULATION REGARDING
EXTENSION OF THE RESPONSE DEADLINE**

Upon the Certification of Counsel and the *Second Stipulation Regarding Extension of the Response Deadline* (the “Stipulation”)² entered into between the Plaintiff and the Debtor Defendants, a copy of which is attached hereto as Exhibit A; and the Bankruptcy Court having jurisdiction to consider approval of the Stipulation; and it appearing that sufficient notice of the Stipulation has been given; and after due deliberation; and good and sufficient cause appearing therefore; it is hereby

ORDERED that the Stipulation is hereby APPROVED; and it is further

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Terms utilized but not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

ORDERED that this Bankruptcy Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

Dated: _____, 2023
Wilmington, Delaware

The Honorable John T. Dorsey
United States Bankruptcy Judge

EXHIBIT A

Stipulation

**IN THE UNITED STATES BANKRUPTCY COURT
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AD HOC COMMITTEE OF NON-US
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Defendants.

Adv. Pro. No. 22-50514 (JTD)

Ref. Nos. 1, 4 & 8

SECOND STIPULATION EXTENDING TIME TO RESPOND TO THE COMPLAINT

This stipulation (the “Stipulation”) is entered into by and between FTX Trading Ltd., and its affiliated debtors and debtors-in-possession (collectively, the “Debtor Defendants”)² and the Ad Hoc Committee of Non-US Customers of FTX.com (the “Plaintiff,” and together with the Debtors, the “Parties”). The Parties, by and through their undersigned counsel, hereby stipulate and agree as follows:

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Each of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession in these chapter 11 cases is named as a Defendant in this Complaint. A list of the Debtor Defendants is listed in Exhibit A of the Complaint [Adv. D.I. 1].

RECITALS

WHEREAS, on December 28, 2022, the Plaintiff filed the *Complaint for Declaratory Judgment* [Adv. D.I. 1] (the “Complaint”) commencing the above-captioned adversary proceeding;

WHEREAS, on December 29, 2022, the Plaintiffs served the Complaint on the Debtor Defendants;

WHEREAS, on January 31, 2023, the Parties entered into the *Stipulation Extending Time to Respond to the Complaint* [Adv. D.I. 4], whereby the Parties agreed to extend the Debtor Defendants’ deadline to answer, move or otherwise respond to the Complaint to February 10, 2023.

WHEREAS, on February 10, 2023, the Debtor Defendants filed the *Motion of Debtors for Entry of an Order Extending Time to Respond to the Complaint* [Adv. D.I. 6].

WHEREAS, on March 1, 2023, the Court entered an order [Adv. D.I. 8] under certification of counsel further extending the deadline to answer, move or otherwise respond to the Complaint to April 14, 2023 (the “Response Deadline”).

WHEREAS the Parties have agreed, as set forth herein, that the Response Deadline shall be further extended to April 21, 2023.

NOW, THEREFORE, in consideration of the foregoing recitals and the mutual promises hereinafter contained, the Parties, intending to be legally bound, hereby stipulate and agree as follows:

1. The Parties agree that the time for the Debtor Defendants to answer, move or otherwise respond to the Complaint is extended to April 21, 2023, which may be further extended by agreement of the Parties or order of the Court.

2. The Parties, by and through their undersigned counsel, each represent and warrant that the undersigned is fully authorized and empowered to execute and deliver this Stipulation on behalf of, and to bind, each Party, as applicable, to the terms and conditions of this Stipulation.

3. This Stipulation may be executed in any number of counterparts, and each such counterpart is to be deemed an original for all purposes, but all counterparts shall collectively constitute one agreement. Further, electronic signatures or transmissions of an originally signed document by facsimile or electronic mail shall be as fully binding on the Parties as an original document.

4. The Bankruptcy Court shall have and retain jurisdiction to resolve any disputes or controversies arising from, in connection with, or related to this Stipulation.

5. Notwithstanding the possible application of any Bankruptcy Rule to the contrary, the Order approving this Stipulation shall be in full force and effect upon its entry.

Dated: April 14, 2023
Wilmington, Delaware

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Dated: April 14, 2023
Wilmington, Delaware

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